

EXHIBIT 1

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JAMES CONTANT, *et al.*,

Plaintiffs,

v.

BANK OF AMERICA CORPORATION;
BANK OF AMERICA, N.A.; MERRILL
LYNCH, PIERCE, FENNER & SMITH
INC.; THE BANK OF TOKYO
MITSUBISHI UFJ LTD.; BARCLAYS
BANK PLC; BARCLAYS CAPITAL INC.;
BNP PARIBAS GROUP; BNP PARIBAS
NORTH AMERICA, INC.; BNP PARIBAS
SECURITIES CORP.; BNP PARIBAS
PRIME BROKERAGE, INC.; CITIGROUP
INC.; CITIBANK, N.A.; CITICORP;
CITIGROUP GLOBAL MARKETS INC.;
CREDIT SUISSE GROUP AG; CREDIT
SUISSE AG; CREDIT SUISSE
SECURITIES (USA) LLC; DEUTSCHE
BANK AG; DEUTSCHE BANK
SECURITIES INC.; THE GOLDMAN
SACHS GROUP, INC.; GOLDMAN,
SACHS & CO.; HSBC BANK PLC; HSBC
NORTH AMERICA HOLDINGS, INC.;
HSBC BANK USA, N.A.; HSBC
SECURITIES (USA) INC.; JPMORGAN
CHASE & CO.; JPMORGAN CHASE
BANK, N.A.; MORGAN STANLEY;
MORGAN STANLEY & CO., LLC;
MORGAN STANLEY & CO.
INTERNATIONAL PLC; RBC CAPITAL
MARKETS LLC; THE ROYAL BANK OF
SCOTLAND PLC; RBS SECURITIES
INC.; SOCIÉTÉ GÉNÉRALE S.A.;
STANDARD CHARTERED BANK; UBS
AG; UBS GROUP AG; and UBS
SECURITIES LLC,

Defendants.

: DOCKET NO. 1:17-cv-03139-LGS

:
:
: **DECLARATION OF JASON**
: **WRIGHT IN SUPPORT OF**
: **FOREIGN DEFENDANTS'**
: **MOTION TO DISMISS FOR LACK**
: **OF PERSONAL JURISDICTION**

I, Jason Wright, declare under penalty of perjury as follows:

1. I am the Company Secretary and an authorized signatory for Barclays Bank PLC (“BBPLC”).

2. I submit this declaration in support of the Foreign Defendants’ Motion to Dismiss for Lack of Personal Jurisdiction in the above-captioned action. The facts stated herein are true and correct, to the best of my knowledge, based on records maintained by BBPLC in the ordinary course of business.

3. Except where otherwise indicated, all statements concern facts as of July 31, 2018, and describe the operations of only BBPLC, not any separately incorporated and distinct subsidiary entities.

4. BBPLC is a financial institution organized under the laws of England and Wales.

5. BBPLC’s registered office and headquarters are located at 1 Churchill Place in London, England.

6. BBPLC is primarily a British bank with extensive business operations throughout the United Kingdom. BBPLC has 28 branches located outside of the United Kingdom, two of which are located in the United States.

BBPLC’s U.S. Operations

7. BBPLC is registered as a financial holding company with the Federal Reserve Bank of New York pursuant to the Bank Holding Company Act of 1956, 12 U.S.C. § 1841 *et seq.*

8. Two of BBPLC’s 28 worldwide branches located outside of the United Kingdom are in the United States. BBPLC has one branch located in New York, New York and another in Miami, Florida.

9. BBPLC has Representative Offices located in Newark, Delaware and Wilmington, Delaware. It has no other Representative Offices in the U.S. These Representative Offices do not generate any revenue for BBPLC and engage in only limited activity, such as acting as a liaison with clients located in the United States, collecting information about the U.S. economy, and providing information about BBPLC to U.S. investors.

10. BBPLC owns no real estate in the United States.

11. In 2017, BBPLC's U.S. branches generated \$1.5 billion in revenue, which accounted for approximately 5.7% of BBPLC's \$27.0 billion worldwide revenue in 2017.

12. By way of comparison, in 2017, BBPLC's U.K. operations generated \$13.4 billion in revenue, which accounted for approximately 49.6% of BBPLC's \$27.0 billion worldwide revenue in 2017.

13. As of August 31, 2018, approximately 263, or approximately 3%, of BBPLC's approximately 8,000 full-time permanent, temporary and graduate payroll employees worldwide were located in the United States.

BBPLC's New York Operations

14. One of BBPLC's 28 branches worldwide is located in New York.

15. BBPLC owns no real estate in New York, and holds no leases for real property in New York.

16. BBPLC is registered as a Foreign Bank Branch and as an Exempt Mortgage Loan Servicer with the New York Department of Financial Services.

17. BBPLC holds a Debt Collector Agency license issued by the New York City Department of Consumer Affairs.

18. As of August 31, 2018, approximately 257, or approximately 3%, of BBPLC's approximately 8,000 full-time permanent, temporary and graduate payroll employees worldwide were located in New York.

19. In 2017, BBPLC's New York branch generated \$1.5 billion in revenue, which accounted for approximately 5.7% of BBPLC's \$27.0 billion worldwide revenue in 2017.

* * *

20. I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct, to the best of my knowledge, information and belief, based on records maintained by BBPLC in the ordinary course of business.

Executed in London, United Kingdom on December 18, 2018.



Jason Wright